

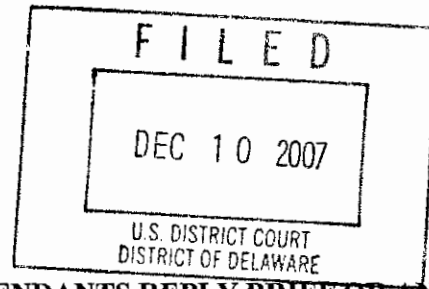
ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Cathy D. Brooks-McCollum
& On behalf of Emerald Ridge Service Corp. Derivative Action
As a Director
PO Box 12166
Wilmington, DE 19850
(302) 521-1241
mccollumc1@comcast.net
(PLAINTIFF)

CIVIL ACTION NO: 04-419 (JJF)
JURY TRIAL REQUESTED

vs.
State Farm Insurance Company
(DEFENDANTS)



**PLAINTIFF'S MOTION TO STRIKE/QUASH/DISMISS DEFENDANTS REPLY BRIEF OR AND ANY
REFERENCE AND FILING MADE BY DEFENDANTS TO ANY DEPOSITION TAKEN BY THEM,
NOT PRESENTED AS PART OF DISCOVERY AND NOT ATTACHED TO THEIR REPLY.**

Defendants reference in their Reply Brief to Summary Judgment a Deposition and Plaintiff hereby request that said reference or any material to any Deposition be Striken/Dismissed and/or Quashed. Plaintiff asked Defendants to present as part of Discovery what they would be referencing for Discovery. Plaintiff and Defendants alike submitted what their Discovery would be, and this was not part of Defendants Discovery. Actually, Defendants refused to supply this discovery to Plaintiff upon request and documented this to a Motion before the Court that they would not supply it to Plaintiff as Attorney/Client Privilege. Defendants still refused to supply a copy of said referenced document to Plaintiff along with their reply brief as to prevent Plaintiff from responding to any items raised by them and/or Plaintiff.

Plaintiff attaches as Exhibit A the E-Mail which does not have an attachment of the Deposition referenced, as has been the practice of these Defendants to omit Discovery.

Whereby, this Motion to STRIKE/QUASH should be GRANTED.

/s/ Cathy D. Brooks-McCollum
PO Box 12166
Wilmington, DE 19850
(302) 521-1241
December, 2007

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Cathy D. Brooks-McCollum
& On behalf of
Emerald Ridge Service Corporation Derivative Action
As a Director
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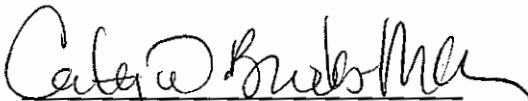
vs.

State Farm Insurance Company
(DEFENDANTS)

PROOF OF SERVICE

I Cathy D. Brooks-McCollum hereby certify that on the th day of December 2007, I will and have caused to be served a true and correct copy of the foregoing Motion To Quash/Strike Exhibits Referenced in Defendants Reply To Summary Judgment electronically upon defendants:

Casarino, Christman & Shalk
Stephen P. Casarino
800 North King St, Suite 200
P.O. Box 1276
Wilmington, DE 19899
(302) 594-4500
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/s/ Cathy D. Brooks-McCollum (Pro Se)
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A**

mccollumc1@comcast.net

From: "Renee Taylor" <rtaylor@casarino.com>
To: <mccollumc1@comcast.net>
Sent: Friday, November 30, 2007 1:00 PM
Attach: Defendant's Answering Brief.pdf
Subject: Brooks-McCullum, et al v. State Farm, et al

12/5/2007

PO Box 12166
Wilmington, DE 19850



United States District Court
For Delaware
844 North King Street
Wilmington, DE 19801

U.S.M.S.
X-RAY